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8 Attorney for Defendant
9 **MIGUEL CASTRO**

10 **UNITED STATES DISTRICT COURT**
11 **FOR THE DISTRICT OF NEVADA**

12 **UNITED STATES OF AMERICA,**
13 **Plaintiff,**
14 **vs.**
15 **MIGUEL CASTRO, ET AL,**
16 **Defendant.**

CASE NO: 2:19-cr-00295-GMN-NJK

**STIPULATION TO MODIFY PRE-
TRIAL RELEASE CONDITIONS TO
ALLOW INTERSTATE TRAVEL**

17 **IT IS HEREBY STIPULATED AND AGREED,** by and between Nicholas A.
18 **Trutanich,** United States Attorney, and Timothy Taesong Finley, Trial Attorney for U.S.
19 **Department of Justice – Consumer Protection Branch,** counsel for the United States of
20 **America,** and Yi Lin Zheng, Esq., counsel for Miguel Castro, that defendant Miguel Castro be
21 **allowed to travel interstate between Nevada and California for the purposes of being able to**
22 **assist his daughter in moving her residence in Los Angeles, California because she became the**
23 **victim of harassment and possible victim of a crime. The parties would respectfully request**
24 **that the Court grant the parties stipulation to modify this specific condition of Defendant’s**
25 **release.**
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1 **IT IS HEREBY STIPULATED AND AGREED UPON**, by and between the parties
2 hereto, that the geographical restriction of Defendant's release conditions shall be modified to
3 allow Defendant to travel between Nevada and California, on Saturday, July 11, 2020 and to
4 return to Nevada on or before Sunday, July 12, 2020, provided that Defendant gives notice to
5 his Pre-Trial Services Officer prior to travel and notice upon return. Further, Defendant's Pre-
6 Trial Services Officer reports that his is currently in good standing and has no opposition to
7 the request to travel interstate.
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10 STIPULATION entered by:

11 _____/s/_____
12 YI LIN ZHENG, ESQ.
13 Nevada Bar No. 10811
14 530 S. Seventh St.
15 Las Vegas, Nevada 89101
16 Attorney for the Defendant
17 MIGUEL CASTRO
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STIPULATION entered by:

_____/s/_____
NICHOLAS A. TRUTANICH
United States Attorney
TIMOTHY FINLEY, Trial Attorney
U.S. Department of Justice
Consumer Protection Branch
PO Box 386
Washington, DC 20044

1 **UNITED STATES DISTRICT COURT**
2 **FOR THE DISTRICT OF NEVADA**

3 UNITED STATES OF AMERICA,
4

5 Plaintiff,

6 vs.

7 MIGUEL CASTRO, ET AL,
8

9 Defendant.

CASE NO: 2:19-cr-00295-GMN-NJK

**ORDER TO MODIFY PRE-TRIAL
RELEASE CONDITIONS TO ALLOW
INTERSTATE TRAVEL**

10 Upon Stipulation of the parties:

11 **IT IS HEREBY ORDERED** that that the geographical restriction of Defendant's
12 release conditions shall be modified to allow Defendant to travel between Nevada and
13 California, on Saturday, July 11, 2020 and to return to Nevada on or before Sunday, July 12,
14 2020, provided that Defendant gives notice to his Pre-Trial Services Officer prior to travel and
15 notice upon return.
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18 DATED this 8th day of July, 2020.

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22 UNITED STATES MAGISTRATE JUDGE
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